

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE NAMENDA INDIRECT PURCHASER)	Case No.: 15 CIV 6549
LITIGATION)	
)	
[MSP Action])	

MOTION TO MODIFY PROTECTIVE ORDER

PLEASE TAKE NOTICE that Plaintiffs MSP Recovery Claims, Series LLC and MSPA Claims 1, LLC, hereby move for an order amending the protective order governing this case (ECF No. 143). On December 10, 2019, the Court issued an order that “Plaintiff in the SBF Action shall share all prior discovery collected in connection with this case and the Direct Purchaser Action with the MSP Plaintiffs.” ECF No. 314 ¶ 7. The parties to this case believe this amendment will facilitate the timely sharing of Confidential and Highly Confidential material.

Plaintiffs MSP Recovery Claims, Series LLC and MSPA Claims 1, LLC propose that the Court enter an order deeming Plaintiffs MSP Recovery Claims, Series LLC and MSPA Claims 1, LLC to be party to, and bound by, the operative protective order governing this case. A form of Proposed Order is appended hereto as Exhibit A.

Dated: December 17, 2019

Respectfully submitted,

/s/ Anna K. Higgins

Anna K. Higgins (admitted pro hac vice)

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CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2019, I served the foregoing on counsel of record via ECF.

/s/ Anna K. Higgins